

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

FILED

FEB 18 2020

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

IN THE MATTER OF THE SEARCH OF:)
)
UNITED STATES POSTAL SERVICE)
PACKAGES, MORE FULLY DESCRIBED)
IN ATTACHMENT A)

3:20-MJ- 1017

AFFIDAVIT

I, Wendy G. Boles, being duly sworn, hereby depose and say:

1. This affidavit is in support of an application to search two (2) parcels for evidence of federal offenses, including the conspiracy to possess with the intent to distribute narcotics, and the possession with the intent to distribute narcotics, in violation of Title 21, United States Code, Sections 841 and 846. As such, I am seeking to search the United States Postal Service ("USPS") Priority Mail parcels containing the following tracking labels #9405 5368 9784 6337 2434 39; and 9405 5368 9784 6337 2434 60. Both parcels list the return address, or commonly referred to as the "sender", as "Jordan Levitt, 6600 Langdon Ave., Van Nuys, CA 91406." The parcel ending in USPS tracking number "2434 39" is addressed to "Danielle Lee, 1305 W. Clinch Ave., Apt. 12, Knoxville, TN 37916-2600." The parcel ending is USPS tracking number "2434 60" is addressed to "Mike Schwartz, 110 Fern St., Knoxville, TN 37914-4015." Both parcels are more fully described in Attachment A ("TARGET PARCELS").

2. I am a Postal Inspector with the United States Postal Inspection Service (USPIS). I have been employed by the United States Postal Service ("USPS") since 1994. I am currently assigned to the United States Postal Inspection Service Office in Knoxville, Tennessee. I have sixteen years of training and experience enforcing federal laws pertinent to the United States Mail. I am responsible for investigating external postal-related crimes, including the investigation of

illegal mailing and receipt of controlled substances, proceeds and related items through the United States Mail in violation of Title 21, United States Code, Sections 841(a), 843(b) and 846. Prior to becoming a Postal Inspector, I was a supervisor of mail processing and distribution in Knoxville, Tennessee.

3. I am an "Investigative or Law Enforcement Officer" within the meaning of Title 18, United States Code, Section 3061, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 3061.

4. Through my training and experience, I am aware that drug traffickers use the U.S. Postal Service's Express and Priority Mail service to ship controlled substances, and/or the proceeds from the sales of controlled substances, because of the service's speed and reliability, as well as the ability to track the status of the delivery remotely. I also know that drug traffickers use the United States Postal Service to ship controlled substances and their proceeds because of the sanctity and protection afforded the United States Mail by federal statute.

5. I am familiar with the ways in which drug traffickers conduct their business, including but not limited to, the methods used to package, wrap, seal and otherwise disguise or mask the odor of narcotics sent through the mail. I am also aware of the fact that narcotics generally flow from narcotics source areas, where the price of narcotics is low, to narcotics destination areas, where the price of narcotics is high. The Eastern District of Tennessee is generally a narcotics destination area.

6. Packages containing drugs and/or proceeds often have heavily taped seams and/or additional outer packaging and wrapping. These packages in many instances contain a fictitious return address; no return address; an actual return address associated to a vacant lot or house; or a return address that is the same as the addressee address. These packages are also sometimes addressed to or from a Commercial Mail Receiving Agency (i.e. UPS Store and Mailboxes Etc.). This is done in order to conceal from law enforcement the identity of the person(s) shipping and/or receiving the controlled substances.

7. Based on the following facts, I believe there is probable cause to believe that narcotics are located inside the TARGET PARCELS.

Probable Cause

8. Based on a law enforcement investigation, the USPIS became aware of suspicious packages being sent through the USPS, from Los Angeles, California a known source area of narcotics, to addresses in the Eastern District of Tennessee area. On or about December 13, 2019, law enforcement placed an alert utilizing a postal service database for inbound parcels mailed from California in which US postage and fees were prepaid utilizing USPS Commercial Base Pricing.

9. On or about February 6, 2020, law enforcement received an alert that the TARGET PARCELS were destined for the Knoxville, Tennessee addresses. Both parcels contained the same return address information of "Jordan Levitt, 6600 Langdon Ave., Van Nuys, CA 91406." Law enforcement researched the listed sender on the TARGET PARCELS and could find no association to a "Jordan Levitt" with that address through open source data bases as well as an inquiry with the USPS.

10. I know based on my training and experience, narcotics shipped through the USPS frequently use fictitious names listed as the sender and recipients of packages to avoid criminal culpability for the actual sender and intended recipient if the package is intercepted.

11. On February 6, 2020, I contacted Officer Brian Mullane, a trained narcotics detection dog handler from the Knoxville Police Department. Officer Mullane conducted an exterior examination of the TARGET PARCELS using a trained narcotics detection dog (K-9). The TARGET PARCELS were placed among four other parcels at the Postal Inspection Service office located at 8880 Cedar Springs Lane Suite 102, Knoxville, Tennessee and alerted only on the TARGET PARCELS.

12. Officer Mullane and his narcotics detector canine, "Milan" conducted an exterior inspection of the subject parcel described below. I was present when the TARGET PARCELS were presented with the other four parcels to drug detection canine, "Milan" by his handler, Officer Mullane. "Milan" reacted positively to the TARGET PARCELS only, according to Officer Mullane. This indicated the TARGET PARCELS contained the scent of controlled substances.


13. The TARGET PARCELS have been maintained, unopened, in my custody pending application for a search warrant.

Conclusion

Based on the facts set forth in this affidavit, I believe that there is probable cause for the issuance of a search warrant to search the TARGET PARCELS, as more fully described in

Attachment A, for evidence of violations of 21 U.S.C. §§ 841(a)(1) and 846, including but not limited to, controlled substances, documents, notes, records, and/or currency related to illegal drug trafficking.

FURTHER, THE AFFIANT SAYETH NOT.



Wendy G. Boles
US Postal Inspector

Subscribed and sworn to before me
this 7th day of February, 2020
at Knoxville, Tennessee



Debra C. Poplin
United States Magistrate Judge



ATTACHMENT A

Item to be Searched

United States Postal Service Priority Mail parcel containing the following tracking label 9405 5368 9784 6337 2434 39. The parcel lists the return address, or commonly referred to as the "sender", as "Jordan Levitt, 6600 Langdon Ave., Van Nuys, CA 91406." The parcel ending with tracking number "2434 39" is addressed to "Danielle Lee, 1305 W. Clinch Ave., Apt. 12, Knoxville, TN 37916-2600" as seen in the photograph below.



ATTACHMENT A

Item to be Searched

United States Postal Service Priority Mail parcel containing the following tracking label 9405 5368 9784 6337 2434 60. The parcel lists the return address, or commonly referred to as the "sender", as "Jordan Levitt, 6600 Langdon Ave., Van Nuys, CA 91406." The parcel ending with tracking number "2434 60" is addressed to "Mike Schwartz, 110 Fern St., Knoxville, TN 37914-4015" as seen in the photograph below.

